

1 employee that was covered by the privilege and  
2 Ms. Covington would be in the same realm as that.

3 MS. SCHMELTZER: I think that was a whole  
4 different.

5 MR. DZIEDZIC: Yeah, and employees of  
6 stations aren't going to be privileged. That's a  
7 different --

8 MS. ABRUTYN: Judge Sippel seems to disagree  
9 with you, so --

10 MR. DZIEDZIC: He's wrong.

11 BY MS. SCHMELTZER:

12 Q Let me break it down. Did there come a time  
13 in February of 1994 when you were contacted by Ms. Barr  
14 concerning either your personal -- your notes or the  
15 1991 calendar?

16 A I don't -- I really don't remember  
17 sequentially the dates.

18 Q Well, do you recall being contacted by  
19 Ms. Barr sometime this year concerning your -- for the  
20 first time concerning your notes or your 1991 calendar?

21 A She contacted me on the calendar that --  
22 sometime after it was lost.

23 Q Well, let's go back to February of 1994. Did  
24 you have a meeting with Ms. Abrutyn on or about  
25 February 9, 1994?

1           A     I don't remember when I had the first meeting  
2 with Abrutyn. I really don't remember.

3           Q     But you do remember having a meeting with  
4 Ms. Abrutyn? Is that correct?

5           A     I met with her, yes.

6           Q     And how did it come about that you met with  
7 Ms. Abrutyn?

8           A     I guess it came about in relationship to this  
9 challenge that they have to the license and to my notes  
10 which had been lost.

11          Q     Did Ms. Abrutyn call you on the telephone?

12          A     She either called or sent a letter.

13          Q     Did you have a meeting with her?

14          A     And I, I told -- I answered I had a meeting  
15 with her. I thought you were asking how the meeting  
16 was established, by phone or by letter.

17          Q     So the meeting was established either --

18          A     I'm not sure.

19          Q     -- by phone or by letter?

20          A     Either by phone or by letter.

21          Q     And you had a meeting. But where was --  
22 where did the meeting take place?

23          A     At Channel 2, that meeting.

24          Q     Was anyone else present?

25          A     I was introduced to her. I think Emily

1 introduced me to her and then we met, Ms. Abrutyn and I  
2 met.

3 Q Did you meet alone with Ms. Abrutyn?

4 A Yes.

5 Q Did Ms. Abrutyn tell you that the original  
6 copy of your notes had been discovered?

7 MS. ABRUTYN: Objection. What she and I  
8 talked about, we just said, we -- this is very close to  
9 the time that we became her attorneys and unless you  
10 can document that it's not a privileged conversation,  
11 not the one that answers your question.

12 MS. SCHMELTZER: Well, unless you can  
13 document that she -- that you were her attorneys on  
14 that date then I think I have every right to go into  
15 this conversati0on.

16 MR. HOWARD: It was in anticipation of  
17 representation -- unless it's a privilege conversation  
18 anyway. If it was conducted in anticipation of  
19 participation of these -- what took place.

20 MR. DZIEDZIC: Is that a statement?

21 MS. ABRUTYN: I mean that -- if we had not,  
22 if we had not yet entered into our formal agreement  
23 yet, counsel --

24 MR. HOWARD: The answer is yes.

25 MR. DZIEDZIC: I mean there wouldn't be,

1 | there wouldn't be circumstances where you would have  
2 | just perhaps -- a potential witness?

3 |           MR. HOWARD: Let's, let's go off the record.  
4 |           (Off the record.)

5 |           MR. HOWARD: With the understanding that this  
6 | does not constitute a broad waiver of privilege. It's  
7 | just there is uncertainty as to the exact date that  
8 | Ms. Covington became represented by Baker and  
9 | Hostetler. It would be better to answer the  
10 | question --

11 |           BY MS. SCHMELTZER:

12 |           Q     And -- if I can remember the question. I  
13 | think it was did Ms. Abrutyn tell you that the original  
14 | copy of your notes had been found?

15 |           A     If I recall I think what I heard was that  
16 | Emily found a copy of the notes, you know, a copy of  
17 | the notes in a file that she had.

18 |           Q     All right. And were you -- was there any  
19 | information about the original copy of the notes that  
20 | was discussed at that meeting?

21 |           A     No, no. She was -- I think the --

22 |           MR. HOWARD: Counsel, would you clarify? you  
23 | were talking about Emily. Now you're talking about a  
24 | meeting. Which meeting are you --

25 |           MS. SCHMELTZER: I'm talking about the

1 meeting with Stephanie, between Ms. Covington and  
2 Stephanie.

3 MR. HOWARD: But you said before Emily, so  
4 it's -- I think it's unclear as to whether the witness  
5 is testifying about --

6 BY MS. SCHMELTZER:

7 Q Was there any discussion at the meeting that  
8 you had with counsel about the location of the original  
9 copy of the notes?

10 A No.

11 Q What was the purpose of the meeting that you  
12 had with Ms. Abrutyn?

13 A I think she was just explaining -- I have  
14 never done anything like this before. I've had a lot  
15 of strange experiences but one of them was never a  
16 deposition. And I mean I think she was just explaining  
17 to me in general and what her representation would be  
18 and the importance of trying to recall, the importance  
19 of always telling the truth and --

20 Q I'm talking about the meeting you had on  
21 February 9, 1994 and that was long before this  
22 deposition. This was the meeting where you heard that  
23 Emily had found a copy of your notes.

24 A No. I don't think that was --

25 Q Do you know why you had a meeting with

1 Ms. Abrutyn on February 9, 1994?

2 A I was because of my involvement and my notes  
3 and my being part of the ascertainment process for the  
4 station. I do not recall the detail of that.

5 Q Well, what was discussed?

6 A I don't remember.

7 Q You don't remember anything that was  
8 discussed at that meeting?

9 A I can't separate out in recall now. I really  
10 have a -- have trouble separating sequentially what  
11 happened when. I'm sorry, but I -- if I can't remember  
12 sequentially I can't answer you sequentially.

13 Q Well, Ms. Covington, this would be -- I  
14 assume this would be the first meeting that you had  
15 with Ms. Abrutyn, the first meeting where you ever met  
16 her.

17 A Um-hum.

18 Q In February of this year.

19 A Um-hum.

20 Q And the subject was your notes.

21 A Um-hum.

22 Q And you were --

23 MS. ABRUTYN: Objection. She just said she  
24 doesn't remember the details of what we talked about.

25 MS. SCHMELTZER: Well, I'm trying to refresh

1 her recollection.

2 MS. ABRUTYN: Don't testify while refreshing  
3 her recollection.

4 MS. SCHMELTZER: I'm not testifying.

5 MS. ABRUTYN: You just said the subject was  
6 her notes. That came out of nowhere.

7 MR. DZIEDZIC: That's the same question she  
8 asked --

9 BY MS. SCHMELTZER:

10 Q What else was discussed about your notes?

11 A I do not recall.

12 Q Do you know how long this meeting took?

13 A I don't think it was a terribly long time.

14 Q Did Ms. Abrutyn make any notes during this  
15 meeting?

16 A I don't know. Can you ask her?

17 Q No. I'm asking you if you know if she did?

18 A Oh, no. I don't know.

19 Q You don't know. Did anyone else come in  
20 during the meeting?

21 A No.

22 Q Were any phone calls made during the meeting?

23 A Not that I recall because when I, when I met  
24 with her at the station it was -- I was introduced to  
25 her and I met with her and I think she, I think she

1 talked to me about in general recalling a request for  
2 information and, you know, the sequence of that. I  
3 think that's why she -- you know, and talked about  
4 instead that if I were involved with this, that they  
5 would -- and would like them to represent me, they  
6 could and I, I was not very familiar with the legal  
7 process and I still don't quite understand, you know,  
8 all of it, but it was kind of just an introduction to  
9 what might follow, as far as I recall.

10 Q During this meeting were you asked if you had  
11 a copy of the notes at your home?

12 A I don't recall but I think --

13 Q Were you asked if you had --

14 A -- but I --

15 Q Sorry.

16 A I don't recall, but I mean it had been long  
17 since I think been established that I didn't have  
18 anything in relation to this.

19 Q When you say it had been long since been  
20 established --

21 A Well, I mean Emily asked me the other time to  
22 go look for the book and find that and I couldn't find  
23 it and I didn't have -- I don't have -- I live in a  
24 condominium. I don't have a photocopying machine.

25 Q And when you say the other time, what time do



1 | you mean by that just so the record's clear?

2 |       A     When Emily asked me the second time and  
3 | called again if -- and wanted the calendar, and I  
4 | looked for it and could not find the calendar.

5 |       Q     And when was that?

6 |       A     That was --

7 |       MS. ABRUTYN:  Objection.  That's been asked  
8 | and answered four times.

9 |       WITNESS:  -- the year before.

10 |       MS. SCHMELTZER:  I'm just trying to make the  
11 | witness' testimony clear here.

12 |       WITNESS:  I think the testimony's clear.  I  
13 | think you're really trying to confuse it.

14 |       MS. SCHMELTZER:  No, I'm not --

15 |       MR. HOWARD:  I've got a question.  What is  
16 | the relevance of this line of inquiry?

17 |       MS. SCHMELTZER:  I'm trying to find out about  
18 | the notes and the 1991 calendar which are the subject  
19 | of the issue.

20 |       WITNESS:  But I, I really feel, if I may say  
21 | this to you, I really feel I have answered you every  
22 | way I can about the notes and about that calendar, and  
23 | you can ask me different ways.  You can put it in a  
24 | time frame of reference that it was a year before or a  
25 | year after or what did you talk about at a time.  It's

1 not going to change the basic facts I have told you.

2 BY MS. SCHMELTZER:

3 Q Okay. At the meeting with Ms. Abrutyn were  
4 you asked any further questions about --

5 A I cannot recall the questions at the meeting  
6 with Ms. Abrutyn.

7 Q I have a specific area I just want to ask  
8 you --

9 MR. HOWARD: That answers your question,  
10 though. That answers your question.

11 MS. SCHMELTZER: No, it doesn't answer. I  
12 have one further question.

13 MR. HOWARD: Excuse me. She, she said she --

14 WITNESS: Well, go ahead and ask it.

15 MS. SCHMELTZER: Were you asked --

16 MR. HOWARD: One more question.

17 BY MS. SCHMELTZER:

18 Q -- any questions at that meeting about the  
19 location of your 1991 calendar, at the meeting with  
20 Ms. Abrutyn, the first meeting you had with her?

21 A I told you I do not recall the specific  
22 questions at that first meeting.

23 Q Okay. Let me ask you, Ms. Covington -- I'm  
24 going to show you a document that Baker and Hostetler  
25 submitted in this proceeding on May 9, 1994. It's

1 identified in the cover letter as a draft of Attachment  
2 E. Attachment E was an exhibit at the hearing. And  
3 what I'd like to do is ask you if you have ever seen  
4 this before?

5 A This letter?

6 Q Yes. Not the letter. I'm sorry. The  
7 attachment. If you would just look through the  
8 attachment and I want to know if you have ever seen  
9 that before.

10 A This attachment?

11 Q And if you look at the very end there's some  
12 handwriting. I don't know whether that will refresh  
13 your recollection or not.

14 A I recognize some of the names in here. These  
15 are people from the --

16 Q Well, my, my question --

17 A You're asking about the specific attachment?

18 Q Yeah. My question is whether you recall ever  
19 seeing --

20 A I don't think I've seen this --

21 Q -- such a document?

22 A -- this specific attachment, no. These are  
23 the names of the people that served on the Community  
24 Advisory Board, not all but most. The only one that  
25 isn't is Nicky, maybe Ruth Kidwell, no.

1 Q And did you recognize the handwriting at the  
2 end of this document?

3 A I'm not very good at handwriting.

4 Q No?

5 A That's not my handwriting.

6 Q No. Do you recognize it?

7 A No.

8 Q Did you ever see any similar exhibit that  
9 might have had more information on it, anything with  
10 this format?

11 A I've seen exhibits with that format.

12 Q You have seen exhibits with that format?

13 A Um-hum.

14 Q You haven't seen this particular exhibit,  
15 however?

16 A No, I have not seen that exhibit.

17 Q Let me show you another exhibit. This was  
18 Four Jacks Exhibit 18 and I don't have copies. I just  
19 want to ask the witness if she recalls having seen this  
20 document before?

21 MS. SCHMELTZER: And you can feel free to  
22 look at it too, counsel.

23 WITNESS: I've seen this document before.

24 BY MS. SCHMELTZER:

25 Q And where did you see this document or

1 similar to that?

2 A Similar to that? Stephanie showed it to me  
3 to make sure that I was in attendance at all of those  
4 things that were mentioned there.

5 Q And when was that?

6 A A few weeks ago. I'm not very good in  
7 recent, you know, recall, but sometime I would say  
8 maybe in the last eight weeks because the last six I've  
9 been tied up.

10 Q Okay. So the first time that you saw this  
11 document --

12 A Was --

13 Q -- was two weeks ago?

14 A Or -- yeah, more than a few because I -- you  
15 know, it wouldn't have been in the last six.

16 Q You weren't consulted about this document in  
17 the summer of 1992 or fall of 1992?

18 MS. ABRUTYN: Shown or consulted?

19 BY MS. SCHMELTZER:

20 Q Were you shown or consulted with a document  
21 such as this in the summer or fall of 1992?

22 A The document in that format?

23 Q Do you ever recall seeing a document that was  
24 in this form and entitled Attachment E in the summer or  
25 fall of --

1           A     I wouldn't, I wouldn't remember your numbers  
2 or your attachments. I'm not familiar with your  
3 terminology.

4           Q     In the summer or fall of 1992 do you recall  
5 seeing any document --

6           A     '92?

7           Q     Um-hum.

8           A     No.

9           Q     -- such as this?

10          A     No.

11          Q     I'd like to show you a copy of what was Four  
12 Jacks Exhibit 25 at the hearing. It's entitled  
13 Community Advisory Board, 1990-1991.

14          A     Yes.

15          Q     And I'd like to ask you if you've ever seen  
16 this document before?

17          A     I've seen it without this notation on it.

18          Q     You've seen it without the notation on it?

19          A     Yes.

20          Q     When was that?

21          A     The same time I saw that other thing you just  
22 showed to me.

23          Q     So a few weeks ago?

24          A     Yes.

25          Q     Was that the first time that you had ever

1 | seen this particular sheet?

2 |       A       Unless this was a file sheet from the  
3 | Community Advisory Board as it was a rotating advisory  
4 | board that you got.

5 |       Q       So the first time that you saw this sheet  
6 | without the markings was a few weeks ago?

7 |       A       Yes.

8 |       MR. DZIEDZIC: I think that's a  
9 | mischaracterization of the testimony.

10 |       MS. SCHMELTZER: That's what I'm trying to  
11 | determine.

12 |       MR. DZIEDZIC: I think she said -- she  
13 | testified previously it would have been more than six  
14 | weeks ago.

15 |       WITNESS: Yeah, that's right. My husband has  
16 | been in the hospital six weeks ago today. I have not  
17 | been involved in this for those last six weeks and I'll  
18 | be glad when I'm not involved in it today. So that's  
19 | why, that's why I can be very accurate about the frame  
20 | -- six weeks.

21 |       MS. SCHMELTZER: No. I'm just trying to  
22 | determine when was the first time that you saw such a  
23 | document without the markings?

24 |       MS. ABRUTYN: What does this have to do with  
25 | anything?

1 WITNESS: Well --

2 MS. SCHMELTZER: This is related to the  
3 renewal expectancy.

4 MS. ABRUTYN: This hearing -- this is not a  
5 document work session.

6 MS. SCHMELTZER: The judge --

7 MS. ABRUTYN: You have a misrepresentation  
8 here.

9 MS. SCHMELTZER: The judge said that  
10 Ms. Covington could be questioned about the renewal  
11 expectancy.

12 MR. HOWARD: No. He said she could be  
13 questioned about anything having to do with the issues  
14 that have been added. Now, we want to have -- we don't  
15 want to cut off inquiry into this, but Ms. Covington  
16 has made it very clear she's anxious to get to the  
17 hospital to be with her husband. You said it wasn't  
18 going to take much longer. I'd like to ask you how  
19 much longer are you going to be doing this?

20 MS. SCHMELTZER: I don't have much longer.

21 WITNESS: I will answer you in terms of this.  
22 In this form, in this piece of paper as it is, if this  
23 were retyped to give you, I don't know. To look at who  
24 was on the Community Advisory Board at that particular  
25 point in time which is a rotating board and I have seen



1 | this sheet of paper if it came out of a file at the  
2 | station. These were the people who were there and,  
3 | interestingly enough, some of them were on the end of a  
4 | rotation on that because Marcus is now -- has a job in  
5 | Washington and, as it says here, Vega isn't here  
6 | anymore. Conley's still on that board but she is in  
7 | Baltimore County now. So I know the names of the  
8 | people who are on this board and if this was typed just  
9 | to give to you in Washington I didn't see it before.  
10 | If it came out of a file at that station I probably  
11 | did. Does that answer your question?

12 | BY MS. SCHMELTZER:

13 | Q I'm not sure.

14 | A Well, I'm not sure either so we're even.

15 | Q Well, let me just, let me just ask very  
16 | briefly, this particular document without the  
17 | markings --

18 | A Um-hum.

19 | Q -- did you ever see it before approximately  
20 | six weeks ago?

21 | MS. ABRUTYN: Objection. She just answered  
22 | that question.

23 | WITNESS: I've been -- I tried to explain to  
24 | you.

25 | BY MS. SCHMELTZER:

1 Q I am asking you what --

2 A I tried to explain to you if -- I mean --  
3 because we had a list at the station of the people who  
4 were on the Community Advisory Board. We had it in  
5 1990 and 1991. If this is a copy of that list, then I  
6 saw it in 1990 and 1991. If it was typed just to be  
7 sent to you for this challenge then, no, I have not  
8 seen it before. I was trying to be accurate in  
9 answering your questions.

10 Q Do you know who made the markings,  
11 Ms. Covington?

12 A No, I do not. Oh, wait. This, this Towson  
13 address is my handwriting. This is not my handwriting.  
14 This is not my handwriting, but the Towson address is  
15 my handwriting so this is probably an old original  
16 piece.

17 Q On Ms. Casey Conley, that's her address?

18 A On Casey Conley. That is my handwriting so  
19 this obviously is a file piece from the, you know, from  
20 the station that was just updated then, but this --  
21 these two are not my handwriting.

22 Q Do you know when you made that -- when you  
23 placed your handwriting on this document?

24 A No, I do not. Probably when she changed her  
25 address so that she could be notified, you know, about

1 the meetings but I don't know when. You want this  
2 back?

3 MS. SCHMELTZER: Why don't we make that  
4 Covington Deposition Exhibit 3?

5 (The document that was  
6 referred to as Covington  
7 Deposition Exhibit No. 3  
8 was marked for  
9 identification.)

10 MS. SCHMELTZER: Ms. Covington, let me just  
11 -- I want to refer you once again to your personal  
12 notes and I would just like to ask you did you do those  
13 all at one sitting?

14 MS. ABRUTYN: Objection. That's been asked  
15 and answered.

16 WITNESS: You asked me --

17 MR. HOWARD: We direct the witness not to  
18 answer. We've got to get this over.

19 MS. SCHMELTZER: All right. Ms. Covington,  
20 why did you start with September, go through September  
21 and then begin again in July --

22 MS. ABRUTYN: Objection. She specifically  
23 said the first time that those notes are in no  
24 particular order and were provided to you in no  
25 particular order meaning anything.

1 MR. DZIEDZIC: Also she testified about this  
2 earlier today.

3 MR. HOWARD: Yes.

4 BY MS. SCHMELTZER:

5 Q Ms. Covington, do you have any knowledge as  
6 to why those pages are separately numbered beginning  
7 with 1 through 5 and then continuing with 1 through 4?

8 A It's not that I continued with -- I mean, it  
9 just could be because somebody put these papers this  
10 way instead of this way.

11 Q And then it would be 1 through 4 and 1  
12 through 5?

13 A Yeah, because I mean -- you asked me if I did  
14 them at separate time. I mean I might have sat in the  
15 chair and done one and done another later. It is my  
16 habit when I work to number things, pages, because I --  
17 then I don't get them mixed up, but --

18 Q Well, all I'm asking is can you explain why  
19 they weren't numbered 1 through 9? Do you explanation  
20 for that?

21 A Because, as I told you earlier, I'm really  
22 not terribly well organized. I am terribly bright and  
23 I did a very good job for the station, but the fact  
24 that I am messy and I don't organize that well and I  
25 write in pencil and I erase may be very important to

1 you as an attorney but, unfortunately, it has never  
2 been a priority for me as a professional.

3 Q Well, quite to the contrary. I think you're  
4 very well --

5 A That's why we're in different professions.

6 Q -- organized, Ms. Covington. I'm not  
7 criticizing your organization at all.

8 A You just ask why I numbered things  
9 differently. I think that is really pretty nit-picky.

10 MR. HOWARD: That's enough. Ms. Schmeltzer,  
11 that's enough. This is, this is utterly irrelevant to  
12 anything that's -- any issue in this case, as to how  
13 she -- we've established they're her notes and you've  
14 been given plenty of opportunity to ask all about them  
15 and you're now disturbing the witness and it's enough.

16 MS. SCHMELTZER: I'm sorry if I'm disturbing  
17 you, Ms. Covington. I certainly had no intention of  
18 disturbing you.

19 WITNESS: I know you didn't because you're a  
20 very nice lady.

21 MS. SCHMELTZER: And if you'll just give us a  
22 minute here.

23 (Off the record.)

24 MS. SCHMELTZER: Ms. Covington, I would like  
25 to ask you about a couple of the September entries that

1 | you made on the notes. And you had earlier testified  
2 | that your notes contained the time of a meeting and the  
3 | person that you met with and perhaps a brief  
4 | description of the subject matter.

5 | MS. ABRUTYN: You mean in the calendar?

6 | MS. SCHMELTZER: In the calendar. That's  
7 | right, the calendar.

8 | WITNESS: Whatever was necessary to trigger.

9 | MS. SCHMELTZER: That's correct. And what  
10 | I'd like to ask you, if you would look at the entries  
11 | in September, most of those contain more detail.

12 | MS. ABRUTYN: I just want to make an  
13 | objection for the record and let her finish. It's my  
14 | understanding that Four Jacks has taken a position that  
15 | anything that's happened after September 3rd is  
16 | irrelevant in this proceeding, so just -- I would like  
17 | to object on the record to you asking a question about  
18 | anything after that time.

19 | MS. SCHMELTZER: Well, that's correct and,  
20 | similarly, Scripps is maintaining that that should be  
21 | different and that's why I'm --

22 | MS. ABRUTYN: That's fine. Like I said, I  
23 | just wanted -- I not going to have a problem with that.  
24 | I just wanted to get that on the record.

25 | BY MS. SCHMELTZER:

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1 Q And I would just like to ask you with regard  
2 to those September entries, did you expand beyond what  
3 was in your calendar based on recollection?

4 A Everything is beyond recollection -- I mean  
5 is based on recollection. I mean in the calendar, I  
6 think I told you, I just had the date and the name of a  
7 person or whatever was needed for me to keep the  
8 meeting, so that all of the notes were based, I think,  
9 on recall and what happened in the meeting. The same  
10 is true of, of these notes. Does that answer your  
11 question?

12 A Yes. Is there some reason why you have more  
13 detail in the entries --

14 MR. HOWARD: Objection.

15 MS. ABRUTYN: Objection.

16 MR. HOWARD: Asked and answered.

17 MS. ABRUTYN: And you've been characterizing  
18 the notes the entire procedure.

19 MR. HOWARD: Don't answer the question.

20 BY MS. SCHMELTZER:

21 Q Your counsel has instructed you not to  
22 answer.

23 A I think because I answered it.

24 Q All right. That's fine. You testified  
25 earlier, Ms. Covington, that there were some more

1 formalized procedures that were adopted by Scripps  
2 Howard after they took over the station regarding  
3 ascertainment? Is that correct?

4 A I think there were the indications and there  
5 was a form that some people filled out after that and  
6 when I talked with Arnie that Scripps Howard was much  
7 more detailed and there was a lot more paperwork  
8 involved than had been the practice under Gillette.

9 Q And do you recall when those procedures began  
10 to be implemented?

11 MS. ABRUTYN: Objection.

12 MS. SCHMELTZER: On what basis?

13 MS. ABRUTYN: You asked that questions --

14 MS. SCHMELTZER: No, I didn't. I did not ask  
15 that question.

16 MR. HOWARD: Not that specific question, but  
17 the subject matter.

18 WITNESS: I think it was a phase-in  
19 implementation.

20 BY MS. SCHMELTZER:

21 Q Do you recall any specific procedures  
22 regarding areas of your responsibility that were  
23 initiated between May 30, 1991 and September 3, 1991?

24 A No, not any absolute. I think there was a --  
25 form that, you know, that was introduced then, but I'm



1 not --

2 Q Do you recall what that form was?

3 A I think it was a form -- more of a short  
4 meeting kind of form, but I don't recall much beyond  
5 that, but I just know that the paperwork -- the  
6 anticipation was in the phasing-in paperwork would be a  
7 different approach then it had been under Gillette.

8 Q In connection with your duties as Director of  
9 Public Affairs did you have any opportunity or reason  
10 to review the station's logs, the program logs?

11 A You mean review them or input them?

12 Q Either one.

13 A Yes. At times I would actually put spots or  
14 put things on the log if the assistant or somebody  
15 else, you know, -- was not there or I would at times go  
16 over the log if there were a -- something came up as a  
17 priority, something I wanted to be sure, you know, got  
18 on the air so, yes, I would review those logs. I would  
19 even do the operational things because I knew how to do  
20 that and, you know, as well as the other so, yes, I had  
21 review of logs.

22 Q And if a log had beside a program N or E did  
23 you know what that meant?

24 A You mean whether it was a network program, an  
25 entertainment program or any of those? I knew that,